

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ZIMMERI CONTRERAZ, individually,

Plaintiff,

vs.

CITY OF TACOMA, a municipal  
corporation; SOUTH SOUND 911, an  
Interlocal agreement agency; and  
CHRISTOPER BAIN, in his individual  
capacity,

Defendants.

No. 3:22-cv-05106-JNW

DECLARATION OF LOREN A.  
COCHRAN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FEES  
AND COSTS

I, Loren A. Cochran, declare and state as follows:

1. I am an attorney in the State of Washington and an owner at the law firm Cochran Douglas, PLLC (Cochran Douglas), in Tacoma, Washington. I founded Cochran Douglas with my law partner Nicholas "Cole" Douglas on March 13, 2020. Previously, I was partner at Pfau Cochran Vertetis Amala, PLLC (PCVA) in Seattle and Tacoma. I am over 18 years of age, and I am competent to testify to the facts herein.

2. I represent the Plaintiff in the above-entitled matter. Plaintiff Zimmeri Contreras retained Cochran Douglas in 2020. Mr. Douglas and I agreed to represent his interests on a contingency fee basis.

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### **Cochran Douglas, PLLC's Reasonable Hourly Rates**

3. I graduated from the University of Washington in 1993 and Boston College Law School in 2002. I have been a member in good standing of the Washington State Bar Association since my admission to the bar. I was an associate and then senior associate at Gordon, Thomas, Honeywell (GTH) from 2002-2006. From 2006-2008, I was the Director of the Freedom of Information Service Center for the Reporters Committee for Freedom of the Press in Arlington, Virginia. From 2008-2011, I was General Counsel for STF Productions, the production entity for the Fox/Twentieth Century Television show "America's Most Wanted," hosted by John Walsh. In 2011, I joined PCVA as a partner. As a trial lawyer at PCVA, I was one of the counsel of record in the \$60 million dollar settlement with the State of Washington and a timber company for wrongful death and injuries from the March 2014 Oso landslide; a \$7.5 million dollar consumer protection action settlement with MultiCare Health System for fraudulent medical services liens; a \$3.8 million settlement with the State of Washington for failure to investigate suspected child abuse and neglect; a \$3.1 million dollar settlement for Department of Social and Health Services (DSHS) negligence; a \$2.75 million dollar settlement with DSHS on a wrongful placement case; a \$2.25 million settlement against the State of Washington for a failure to investigate child abuse and neglect; a \$1 million settlement against the Clover Park School District for its failure to protect a special needs' student from sexual abuse; a \$1 million settlement for a wrongful death drowning case; and, a \$750,000 jury verdict on a school sexual abuse case.

4. As an owner/partner with Cochran Douglas, I have been co-counsel and lead counsel in a \$8 million settlement with the City of Tacoma for excessive use of force, a \$5.25 million settlement against a nursing home for a wrongful death, and a \$1.5 million settlement with the State of Washington for its failure to protect a dependent child at risk of abuse and neglect, and a \$1.5 million final judgment following trial for a sex abuse victim with claims

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1 against a school district. In addition, I have been selected by Washington Law & Politics  
2 Magazine as a Super Lawyer since 2014.

3 5. My partner on this case, Cole Douglas, is a 2015 graduate of Seattle University  
4 School of Law in Seattle, Washington, where he graduated with honors. Mr. Douglas has been  
5 a member of the Washington State Bar since 2015, and he is admitted to practice in both state  
6 and federal courts, as well as the United States Court of Appeals for the 9<sup>th</sup> Circuit. From 2015  
7 until 2020, Mr. Douglas was an associate at the law firm Pfau Cochran Vertetis Amala, PLLC,  
8 (PCVA) in Tacoma, Washington.

9 6. Prior to law school, Mr. Douglas obtained both his undergraduate degree and his  
10 MBA from Willamette University in Salem, Oregon.

11 7. Over the past 5 years, Mr. Douglas has won a significant number of multimillion  
12 dollar results for clients. His legal philosophy is guided by the desire to assist those severely  
13 injured or damaged by well-funded defendants who have abused their power, acted recklessly  
14 in their disregard for others, or violated their civil rights. A few examples of his casework  
15 include an eight-figure settlement against a confidential entity stemming from a premises  
16 liability action; a \$5.9 million judgment entered against a Parkland, Washington bar stemming  
17 from a dram shop action; a \$5.25 million settlement against a nursing home for a wrongful  
18 death; a \$3.8 million settlement against the Washington DSHS for a sexual abuse victim; and a  
19 \$1.5 million final judgment following trial for a sex abuse victim with claims against a school  
20 district. His practice areas include catastrophic injury or death, medical malpractice, sexual  
21 abuse, insurance bad faith, product liability, and general serious personal injury.

22 8. In 2019, Mr. Douglas served on the Board of Trustees for the Tacoma Pierce  
23 County Bar Association as the President of the New & Young Lawyer Board. He has  
24 consistently been selected to Super Lawyer's list of Rising Stars in Washington State since  
25 2018. He has also been selected as one of the Top 40 Under 40 civil plaintiff attorneys by the  
26

DECLARATION OF LOREN A. COCHRAN IN  
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1 National Trial Lawyers. In 2022, Mr. Douglas was selected to the 40 Under 40 List by the South  
2 Sound Business Journal.

3 9. Attorney Tiffany Wilke from Cochran Douglas also spent time working on this  
4 matter. She is a member in good standing of the Washington State Bar and one of the named  
5 attorneys of record. Ms. Wilke is admitted to practice in both state and federal courts.

6 10. Prior to joining Cochran Douglas, Ms. Wilke worked as a defense attorney for  
7 two large insurance companies as staff counsel. In those roles, she resolved hundreds of  
8 personal injury cases on behalf of her clients. As a trial lawyer at Cochran Douglas, Ms. Wilke  
9 has focused her practice on the trial and litigation of complex personal injury cases involving  
10 catastrophic injury or death, medical malpractice, sexual abuse, insurance bad faith, and product  
11 liability. In the past year, Ms. Wilke's casework included a \$1.025 million settlement for a  
12 motor vehicle collision victim, as well as a \$1 million settlement for a sex abuse victim who  
13 was targeted at an alcohol treatment center.

14 11. She is a 2015 graduate of Seattle University School of Law, where she graduated  
15 with honors. Prior to law school, Ms. Wilke obtained her undergraduate degree with honors  
16 from Boise State University, where she also was a four-year letterman on the Varsity Women's  
17 Soccer team.

18 12. Ms. Wilke was selected to Super Lawyer's list of Rising Stars in Washington  
19 this past year, and she currently is an active member of Washington Women Lawyers. She is  
20 also the President Elect of the Washington State Bar Association's Litigation Committee.

21 13. This case was very complex and the evidence uncovered took great efforts.  
22 Countless documents were reviewed and numerous hours were spent researching statutes,  
23 regulations, policies and case law in order to prepare this case for dispositive motions. The  
24 respective dockets to this case detail how extensively the PRA claims have been litigated over  
25 the past two (2) years.  
26

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1           14. In pursuing this matter, I made every effort to litigate this matter efficiently by  
2 coordinating the work of our attorneys and staff, minimizing duplication, and assigning tasks  
3 in a time and cost-efficient manner, based on the timekeeper's experience levels and talents.

4           15. Although Cochran Douglas is primarily a contingency fee firm, we regularly  
5 monitor and keep current on legal developments in the subject of attorneys' fees, as many of  
6 our federal cases allow attorney fees to be awarded. Together with Mr. Douglas, we periodically  
7 establish hourly rates for the billing personnel at our firm. We establish the rates based on  
8 prevailing market rates for attorneys and law firms in the Seattle/Tacoma area that have  
9 attorneys and staff of comparable skill, experience, and qualifications. We obtain information  
10 concerning market rates from other attorneys in the area that have similar work experience  
11 doing similar work, from information that occasionally appears in the local press and national  
12 bar publications, and in orders awarding attorney's fees.

13           16. Based on our years of practice, experience, and success in litigating complex  
14 personal injury cases, the hourly rate we've calculated for me is \$600 per hour, \$500 per hour  
15 for Mr. Douglas, and \$450 per hour for Ms. Wilke. In setting these hourly rates, my firm  
16 consulted with attorneys with national reputations, experience and practices like ours. We  
17 determined that the rates we charge are reasonable for attorneys of our experience, reputation  
18 and expertise and are consistent with the prevailing market rates for attorneys of comparable  
19 levels of expertise and reputation at Seattle area law firms that practice complex litigation. The  
20 following supporting documents validate our rates:

- 21           a. Attached as **Exhibit 1** is a true and correct copy of the National Law Journal's 2011  
22 survey of nation-wide billing rates.
- 23           b. Attached as **Exhibit 2** is a true and correct copy of the National Law Journal's 2015  
24 survey of nation-wide billing rates.
- 25
- 26

DECLARATION OF LOREN A. COCHRAN IN  
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AND COSTS

18. Attached as **Exhibit 4** is a true and correct copy of Federal Form AO 133, the Bill of Costs, and an accompanying declaration with a cost statement associated with the prosecution of the PRA claims at issue.

I DECLARE UNDER PENALTY AND PERJURY UNDER THE LAWS OF THE  
STATE OF WASHINGTON AND OF THE UNITED STATES OF AMERICA, 28 U.S.C.  
1746, THAT THE FOREGOING IS TRUE AND CORRECT.

By: /s/ Loren A. Cochran  
Loren A. Cochran

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**CERTIFICATE OF SERVICE**

I, **Kim Snyder**, hereby declare under penalty of perjury under the laws of the State of Washington and the United States of America that I am an attorney at Cochran Douglas Law and that on today's date, I served the foregoing via **ECF and email**, by directing delivery to the following individuals:

Kymm Cox  
Jennifer Taylor  
CITY OF TACOMA ATTORNEY  
747 Market Street, Room 1120  
Tacoma, WA 98402  
jtaylor@cityoftacoma.org  
gcastro@cityoftacoma.org  
bpittman@cityoftacoma.org  
kcox@cityoftacoma.org

*Attorneys for Defendants City of Tacoma and Christopher Bain*

DATED this 29th day of March, 2024.

/s/ Kim Snyder  
Kim Snyder, Legal Assistant

DECLARATION OF LOREN A. COCHRAN IN  
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# **EXHIBIT 1**



2011

**BILLING SURVEY**

A SPECIAL REPORT

Firm Name	Principal or Largest Office	Average full-time equivalent Attorneys*	Firmwide Average Billing Rate	Firmwide Median Billing Rate	Partner Billing Rate: High	Partner Billing Rate: Low	Partner Billing Rate: Average	Partner Billing Rate: Median	Associate Billing Rate: High	Associate Billing Rate: Low	Associate Billing Rate: Average
Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, Tenn.	527	\$311	\$310	\$595	\$250	\$357	\$345	\$315	\$160	\$228
Best Best & Krieger	Riverside, Calif.	195	\$358	\$360	\$575	\$275	\$417	\$420	\$375	\$205	\$265
Briggs and Morgan	Minneapolis	185			\$625	\$325			\$305	\$230	
Broad and Cassel	Orlando, Fla.	160	\$377	\$350	\$575	\$295	\$435	\$395	\$350	\$180	\$265
Bryan Cave	St. Louis	908	\$475	\$460	\$795	\$375	\$565	\$553	\$540	\$200	\$356
Butzel Long	Detroit	176			\$700	\$325	\$440		\$425	\$225	\$274
Carlton Fields	Tampa, Fla.	270	\$397	\$400	\$815	\$320	\$470	\$470	\$380	\$195	\$262

Firm Name	Principal or Largest Office	Average full-time equivalent Attorneys *	Firmwide Average Billing Rate	Firmwide Median Billing Rate	Partner Billing Rate: High	Partner Billing Rate: Low	Partner Billing Rate: Average	Partner Billing Rate: Median	Associate Billing Rate: High	Associate Billing Rate: Low	Associate Billing Rate: Average
Kaye Scholer	New York	425	\$661	\$665	\$1080	\$685	\$831	\$835	\$705	\$310	\$519
Kelley Drye & Warren	New York	321	\$474	\$400	\$925	\$480	\$634	\$645	\$595	\$275	\$425
Knobbe, Martens, Olson & Bear	Irvine, Calif.	268	\$439	\$415	\$735	\$415	\$525	\$500	\$495	\$295	\$346
Lane Powell	Seattle	180	\$405	\$425	\$645	\$340	\$460	\$450	\$360	\$225	\$295
Lathrop & Gage	Kansas City, Mo.	281	\$337	\$340	\$735	\$275	\$390	\$390	\$410	\$205	\$246
Lewis, Rice & Fingersh	St. Louis	162	\$275		\$470	\$270			\$320	\$150	
Lowenstein Sandler	Roseland, N.J.	249	\$478	\$480	\$895	\$435	\$613	\$595	\$660	\$250	\$400
Manatt, Phelps & Phillips	Los Angeles	322	\$602	\$620	\$850	\$540	\$676	\$670	\$550	\$215	\$464
McElroy, Deutsch, Mulvaney & Carpenter	Morristown, N.J.	272	\$245	\$275	\$575	\$295	\$350	\$375	\$325	\$185	\$250

Firm Name	Principal or Largest Office	Average full-time equivalent Attorneys <sup>a</sup>	Firmwide Average Billing Rate	Firmwide Median Billing Rate	Partner Billing Rate: High	Partner Billing Rate: Low	Partner Billing Rate: Average	Partner Billing Rate: Median	Associate Billing Rate: High	Associate Billing Rate: Low	Associate Billing Rate: Average
Nexsen Pruet	Columbia, S.C.	178			\$550	\$235			\$265	\$170	
Patton Boggs	Washington	512	\$546	\$540	\$990	\$410	\$659	\$645	\$570	\$240	\$410
Pepper Hamilton	Philadelphia	459			\$825	\$380	\$557		\$460	\$235	\$344
Perkins Cole	Seattle	693	\$462		\$875	\$285	\$550	\$545	\$590	\$215	\$368
Phelps Dunbar	New Orleans	280	\$236	\$225	\$465	\$190	\$281	\$275	\$245	\$150	\$189
Polsinelli Shugart	Kansas City, Mo.	466			\$630	\$275			\$335	\$205	
Saul Ewing	Philadelphia	220	\$431	\$450	\$750	\$350	\$502	\$490	\$495	\$245	\$326
Schulte Roth & Zabel	New York	406	\$615	\$630	\$935	\$770	\$846	\$840	\$675	\$285	\$608
Seyfarth Shaw	Chicago	702	\$437	\$425	\$790	\$355	\$528	\$525	\$505	\$225	\$341
Sheppard, Mullin, Richter & Hampton	Los Angeles	465			\$860	\$505			\$635	\$275	

## **EXHIBIT 2**



## **2015 NLJ Billing Survey**

**Source: National Law Journal**

**Category: National Law Journal**

ALM Legal Intelligence, in association with The National Law Journal, collected 2015 hourly billing rates for partners, associates, of counsel and paralegals. The data sources include the published rates from the 20 largest federal bankruptcy jurisdictions and a survey of the nation's 350 largest firms conducted during October and November of 2015. Individual firm rates are not identified.

**Hourly Billing Rates for 2015**

	Partner			Associate		
	High	Low	Median	High	Low	Median
<b>Overall Hourly Rates</b>	\$1,295	\$90	\$395	\$950	\$50	\$350

**Rates by Firm Size**

1 - 25 lawyers	\$1,080	\$90	\$350	\$950	\$90	\$300
26 - 150 lawyers	\$1,050	\$190	\$460	\$900	\$100	\$300
151 or more lawyers	\$1,295	\$100	\$595	\$975	\$125	\$325

**Rates by State**

AL	\$725	\$200	\$375	\$375	\$175	\$300
AZ	\$750	\$125	\$375	\$750	\$175	\$250
CA	\$1,080	\$200	\$495	\$950	\$300	\$350
CO	\$893	\$350	\$443	\$642	\$150	\$325
CT	\$1,200	\$295	\$350	\$625	\$175	\$350
DC	\$1,095	\$975	\$1,035	\$655	\$350	\$375
DE	\$1,050	\$295	\$650	\$850	\$260	\$388
FL	\$625	\$175	\$375	\$525	\$100	\$300
GA	\$500	\$250	\$358	\$450	\$110	\$275
IL	\$985	\$200	\$420	\$710	\$150	\$300
IN	\$400	\$250	\$305	\$400	\$200	\$275
KY	\$340	\$200	\$290	\$350	\$200	\$275
LA	\$575	\$150	\$333	\$500	\$100	\$250
MA	\$650	\$300	\$475	\$500	\$260	\$350
MD	\$560	\$250	\$363	\$580	\$150	\$325
MI	\$375	\$190	\$265	\$400	\$125	\$275
NC	\$675	\$250	\$425	\$435	\$150	\$275

NJ	\$880	\$250	\$400	\$400	\$150	\$298
NM	n/a	n/a	n/a	\$350	\$175	\$200
NV	\$450	\$295	\$375	\$500	\$200	\$325
NY	\$1,295	\$100	\$420	\$975	\$90	\$350
OH	\$545	\$250	\$313	\$330	\$155	\$250
OR	\$485	\$315	\$370	\$325	\$230	\$300
PA	\$875	\$200	\$350	\$565	\$86	\$257
PR*	\$300	\$100	\$200	\$350	\$100	\$200
TN	\$735	\$225	\$300	\$350	\$150	\$250
TX	\$925	\$90	\$395	\$650	\$150	\$298
VA	\$545	\$220	\$335	\$495	\$175	\$295
WA	\$965	\$275	\$460	\$375	\$150	\$350
WI	\$595	\$560	\$578	n/a	n/a	n/a

Of Counsel				Paralegal		
	High	Low	Median	High	Low	Median
Overall Hourly Rates	\$1,120	\$125	\$350	\$325	\$25	\$125

#### Rates by Firm Size

1 - 25 lawyers	\$645	\$125	\$350	\$325	\$25	\$115
26 - 150 lawyers	\$620	\$225	\$393	\$305	\$75	\$173
151 or more lawyers	\$1,120	\$270	\$610	\$325	\$35	\$220

#### Rates by State

AL	\$495	\$290	\$393	n/a	n/a	n/a
AZ	\$750	\$250	\$300	\$250	\$75	\$125
CA	\$595	\$175	\$450	\$325	\$25	\$150
CO	\$400	\$325	\$363	\$285	\$75	\$158
CT	\$550	\$325	\$438	\$290	\$75	\$100
DC	\$775	\$275	\$750	n/a	n/a	n/a

DE	\$525	\$260	\$275	\$305	\$125	\$235
FL	n/a	n/a	n/a	\$255	\$65	\$123
GA	\$250	\$240	\$245	\$160	\$50	\$120
IL	\$1,120	\$395	\$430	\$215	\$75	\$120
IN	\$300	\$225	\$295	\$220	\$90	\$100
KY	n/a	n/a	n/a	\$150	\$75	\$105
LA	\$425	\$200	\$350	\$285	\$45	\$83
MA	n/a	n/a	n/a	n/a	n/a	n/a
MD	\$350	\$250	\$275	\$280	\$75	\$125
MI	n/a	n/a	n/a	\$125	\$75	\$103
NC	n/a	n/a	n/a	\$180	\$75	\$110
NJ	\$565	\$225	\$325	\$195	\$65	\$120
NM	n/a	n/a	n/a	n/a	n/a	n/a
NV	n/a	n/a	n/a	\$240	\$75	\$152
NY	\$930	\$250	\$573	\$325	\$60	\$130
OH	n/a	n/a	n/a	\$135	\$85	\$100
OR	\$450	\$310	\$380	\$220	\$145	\$185
PA	\$440	\$300	\$325	\$325	\$75	\$105
PR*	\$250	\$125	\$188	\$150	\$45	\$75
TN	\$300	\$270	\$300	\$150	\$50	\$90
TX	\$740	\$225	\$320	\$290	\$35	\$100
VA	\$400	\$300	\$350	\$325	\$75	\$95
WA	n/a	n/a	n/a	\$215	\$125	\$143
WI	n/a	n/a	n/a	n/a	n/a	n/a

n/a: data not available

\*Puerto Rico is a U.S. Territory



# **EXHIBIT 3**



## Billable Time Worked Report

*Contreras v. City of Tacoma*  
No. 3:22-cv-05106-JNW

Report Generated: 3/28/2024

Date	Atty	Description	Time	Rate (\$)	Value (\$)
8/6/20	LAC	TC and message w client	0.2	600.00	\$120.00
8/13/20	LAC	TC with client	0.2	600.00	\$120.00
8/13/20	LAC	TC with client	0.2	600.00	\$120.00
8/24/20	LAC	TC with client	0.2	600.00	\$120.00
9/22/20	LAC	Research into TPD's website	1.0	600.00	\$600.00
10/29/20	LAC	LOR to Crime Victims Compensation	0.2	600.00	\$120.00
2/11/21	LAC	TC with client w update	0.5	600.00	\$300.00
2/24/21	LAC	TC with client regarding tort claim form and filing suit	0.5	600.00	\$300.00
3/19/21	LAC	Working on tort claim form	1.2	600.00	\$720.00
3/19/21	LAC	TC w client about tort claim form	0.2	600.00	\$120.00
4/14/21	LAC	working on tort claim form	1.0	600.00	\$600.00
4/15/21	LAC	finalizing and filing tort claim form	1.2	600.00	\$720.00
4/19/21	LAC	Review of confirmation of tort claim form delivery	0.2	600.00	\$120.00
4/24/21	LAC	PRA requests for TPD records	0.8	600.00	\$480.00
4/27/21	LAC	Review of COT response letter on tort claim form	0.2	600.00	\$120.00
5/3/21	LAC	TC with client	0.5	600.00	\$300.00
5/3/21	LAC	Review of records response from City of Tacoma	0.2	600.00	\$120.00
5/10/21	LAC	Review and email regarding no records from COT	0.2	600.00	\$120.00
5/12/21	LAC	PRA requests to TPD and SS911 for CAD reports	0.5	600.00	\$300.00
8/20/21	LAC	Researching PRA and Section 1983 case law	6.0	600.00	\$3,600.00
9/28/21	LAC	Case law review	4.5	600.00	\$2,700.00
1/31/22	LAC	Drafting complaint for damages	7.2	600.00	\$4,320.00
2/1/22	LAC	Finishing complaint for damages, review with NBD	1.5	600.00	\$900.00



## Billable Time Worked Report

***Contreras v. City of Tacoma***  
**No. 3:22-cv-05106-JNW**

**Report Generated: 3/28/2024**

2/2/22	LAC	Drafting summons and researching service of process	3.0	600.00	\$1,800.00
2/15/22	LAC	Meeting with NBD, reviewing declaration of service, discussion of SOP on Bain	1.5	600.00	\$900.00
2/15/22	LAC	TC with client; discussion of next steps	0.5	600.00	\$300.00
2/15/22	NBD	Case meeting w LAC	1.5	500.00	\$750.00
2/16/22	LAC	Review of notice of appearance, TC with client and ET	1.0	600.00	\$600.00
2/16/22	LAC	Meeting with NBD and ET regarding next steps; file review	2.0	600.00	\$1,200.00
2/16/22	NBD	Case meeting w LAC and ET	2.0	500.00	\$1,000.00
2/18/22	LAC	Reviewing notice of removal to federal court; reviewing FRCP regarding case conference and initial disclosures	1.2	600.00	\$720.00
3/10/22	LAC	Review of acceptance of service	0.5	600.00	\$300.00
3/17/22	LAC	Emails re PRA requests and review of file regarding previous PRA requests	4.5	600.00	\$2,700.00
3/31/22	LAC	TC regarding amended answer	0.8	600.00	\$480.00
3/31/22	LAC	Review of Stip to amend answer	0.2	600.00	\$120.00
4/6/22	LAC	Review of Ct's order on stip answer	0.2	600.00	\$120.00
5/10/22	LAC	Review of FRCP 26 and TC with counsel for conference	2.0	600.00	\$1,200.00
5/15/22	LAC	Meeting with NBD regarding initial disclosures	1.5	600.00	\$900.00
5/15/22	NBD	Meeting with LAC on initial disclosures	1.5	500.00	\$750.00
5/16/22	LAC	Reviewing initial disclosures	2.0	600.00	\$1,200.00
5/17/22	LAC	Serving Initial Disclosures	0.5	600.00	\$300.00
5/17/22	LAC	Review of City's Initial Disclosures	1.0	600.00	\$600.00
5/18/22	LAC	Draft jury demand and send for filing and service	0.5	600.00	\$300.00
5/23/22	LAC	Serving Plfs supplemental disclosures	0.5	600.00	\$300.00

***Contreras v. City of Tacoma***  
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## Billable Time Worked Report

***Contreras v. City of Tacoma***  
**No. 3:22-cv-05106-JNW**

**Report Generated: 3/28/2024**

6/16/22	LAC	Review COT's notice of unavailability	0.2	600.00	\$120.00
8/3/22	LAC	Review of new judicial assignment	0.2	600.00	\$120.00
9/27/22	LAC	Drafting stip on new case schedule dates	0.5	600.00	\$300.00
9/27/22	LAC	Review Cts Order on new case schedule	0.2	600.00	\$120.00
10/26/22	LAC	Dep prep for K. Jepson	5.0	600.00	\$3,000.00
10/27/22	LAC	Dep of K. Jepson	3.5	600.00	\$2,100.00
11/17/22	LAC	Review of COTs motion to compel	0.5	600.00	\$300.00
3/14/23	LAC	Review NOD on 30b6 complaint process	0.2	600.00	\$120.00
3/16/23	LAC	Review Subpoena for R. Franco	0.2	600.00	\$120.00
3/16/23	LAC	Review Subpoena for B. Scheetz	0.2	600.00	\$120.00
4/16/23	LAC	Dep prep for J. Douglas	1.0	600.00	\$600.00
4/17/23	LAC	Dep of J. Douglas	2.6	600.00	\$1,560.00
4/24/23	LAC	Review Defs Motion for protective order and accompanying declarations	1.5	600.00	\$900.00
4/27/23	LAC	Dep of G. Roberts	1.6	600.00	\$960.00
5/1/23	LAC	Review NOVD of C. Bain	0.2	600.00	\$120.00
6/26/23	LAC	Review Cts Order on disputed docs w NBD and TLW	1.0	600.00	\$600.00
6/26/23	NBD	Case meeting with LAC	1.0	500.00	\$500.00
6/26/23	TLW	Review Cts Order on disputed docs w NBD and LAC	1.0	450.00	\$450.00
6/26/23	NBD	Review Cts Order on disputed docs w LAC and TLW	1.0	500.00	\$500.00
7/31/23	LAC	Read and return emails on info re Guy Bollinger	0.5	600.00	\$300.00



## Billable Time Worked Report

***Contreras v. City of Tacoma***  
**No. 3:22-cv-05106-JNW**

**Report Generated: 3/28/2024**

9/19/23	LAC	Email to OC regarding discovery extension and return email	0.5	600.00	\$300.00
9/20/23	LAC	Email re Bain crash and schedule	0.2	600.00	\$120.00
9/25/23	LAC	Email with COT re dep scheduling	0.2	600.00	\$120.00
9/27/23	LAC	Dep prep for R. Franco	2.7	600.00	\$1,620.00
9/28/23	LAC	Dep of R. Franco	1.3	600.00	\$780.00
9/28/23	LAC	Prep, travel and dep of B. Scheetz	2.5	600.00	\$1,500.00
10/1/23	LAC	Draft stipulation on discovery dates	0.5	600.00	\$300.00
10/2/23	LAC	Finalize and send out stip on discovery dates	0.2	600.00	\$120.00
10/4/23	LAC	File stipulated motion to move disc dates	0.2	600.00	\$120.00
10/10/23	LAC	Review Cts email on status conference and review dates with KS	0.2	600.00	\$120.00
10/10/23	LAC	Email to OC on Cts email	0.2	600.00	\$120.00
10/16/23	LAC	Prep and attend via Zoom Cts Status Conf	0.5	600.00	\$300.00
11/12/23	LAC	Dep prep for C Bain	3.0	600.00	\$1,800.00
11/13/23	LAC	Dep prep for C Bain	3.0	600.00	\$1,800.00
11/14/23	LAC	Dep of C. Bain	3.7	600.00	\$2,220.00
11/17/23	LAC	Email and follow up TC w client	1.2	600.00	\$720.00
11/20/23	LAC	Dep prep for E. Levitt	4.5	600.00	\$2,700.00
11/21/23	LAC	Dep of E. Levitt	2.3	600.00	\$1,380.00
11/21/23	LAC	Prep for E Levitt dep; email with exhibits to counsel	1.5	600.00	\$900.00
11/21/23	LAC	Email to court reporter with exhibits	0.2	600.00	\$120.00
11/28/23	LAC	Review of C Bain dep transcript	0.5	600.00	\$300.00



## Billable Time Worked Report

***Contreras v. City of Tacoma***  
**No. 3:22-cv-05106-JNW**

**Report Generated: 3/28/2024**

11/30/23	LAC	Meeting with KS on deps re FIRs	0.5	600.00	\$300.00
12/3/23	LAC	TC w client	1.0	600.00	\$600.00
12/4/23	LAC	Defended Client deposition	7.0	600.00	\$4,200.00
12/10/23	LAC	Defended Client deposition	1.0	600.00	\$600.00
12/11/23	LAC	Dep of J. Branham	1.8	600.00	\$1,080.00
12/18/23	NBD	NBD dep prep on COT rep deps of K Morris and G Roberts	3.5	500.00	\$1,750.00
12/19/23	NBD	Dep of Kipling Morris	1.8	500.00	\$900.00
12/19/23	NBD	NBD dep prep for G Roberts	2.0	500.00	\$1,000.00
12/20/23	NBD	Dep of G. Roberts	2.5	500.00	\$1,250.00
12/26/23	LAC	Email with court reporter on K. Morris and Gary Roberts dep transcripts	0.2	600.00	\$120.00
12/26/23	LAC	Email with EB re supplementing initial disclosure with Bain and Levitt FIRs	0.2	600.00	\$120.00
12/26/23	LAC	Email to OC on FIRs and TPD-FTOs	0.2	600.00	\$120.00
12/26/23	LAC	Reviewing file, research and writing MSJ on PRA against COT	3.5	600.00	\$2,100.00
12/27/23	LAC	File review and drafting MSG on PRA against COT	2.0	600.00	\$1,200.00
12/28/23	LAC	Drafting motion and prepping Decl. on PRA MSJ	2.5	600.00	\$1,500.00
12/29/23	LAC	TC with NBD and TLW regarding PRA MSJ	0.5	600.00	\$300.00
12/29/23	LAC	Finalizing motion; finalizing dec and filing and service of PRA MSJ against COT	7.8	600.00	\$4,680.00
12/29/23	NBD	TC w LAC and TLW	0.5	500.00	\$250.00
12/29/23	NBD	Review MSJ on PRA	1.0	500.00	\$500.00
12/29/23	TLW	Review MSJ on PRA	1.0	450.00	\$450.00



## Billable Time Worked Report

*Contreras v. City of Tacoma*  
No. 3:22-cv-05106-JNW

Report Generated: 3/28/2024

1/17/24	LAC	Emails with OC and Court on oral argument	0.3	600.00	\$180.00
1/22/24	LAC	TC meeting w Client	0.5	600.00	\$300.00
1/22/24	LAC	TC w client	0.7	600.00	\$420.00
1/24/24	LAC	Drafting reply ISO PRA MSJ; case research	1.5	600.00	\$900.00
1/25/24	LAC	Drafting reply ISO PRA MSJ; Prepping Decl	2.5	600.00	\$1,500.00
1/26/24	LAC	Finalizing reply and decl ISO PRA MSJ and filing and service	2.0	600.00	\$1,200.00
1/26/24	NBD	Reviewing reply to MSJ re PRA	0.8	500.00	\$400.00
1/26/24	TLW	Review reply on PRA	1.0	450.00	\$450.00
2/7/24	LAC	Oral argument prep on MSJs	6.0	600.00	\$3,600.00
2/8/24	LAC	Drive to Seattle courthouse; Oral argument; Return to Tacoma	3.3	600.00	\$1,980.00
<b>Total Hours:</b>			<b>167.1</b>	<b>Total</b>	<b>\$97,900.00</b>

**Total LAC  
Hours: 145**

**Total NBD  
Hours: 19.1**

**Total TLW  
Hours: 3**

# **EXHIBIT 4**



## UNITED STATES DISTRICT COURT

for the

Western District of Washington

Zimmeri Contreras, Plaintiff

v.

City of Tacoma, et al., Defendants

Case No.: 3:22-cv-05106-JNW

## BILL OF COSTS

Judgment having been entered in the above entitled action on 03/15/2024 against The City of Tacoma,  
*Date*  
the Clerk is requested to tax the following as costs:

Fees of the Clerk .....	\$ _____
Fees for service of summons and subpoena .....	_____
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case .....	<u>5,236.96</u>
Fees and disbursements for printing .....	_____
Fees for witnesses ( <i>itemize on page two</i> ) .....	<u>0.00</u>
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case. ....	_____
Docket fees under 28 U.S.C. 1923 .....	_____
Costs as shown on Mandate of Court of Appeals .....	_____
Compensation of court-appointed experts .....	_____
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828 .....	_____
Other costs ( <i>please itemize</i> ) .....	<u>137.00</u>
TOTAL	\$ <u>5,373.96</u>

**SPECIAL NOTE:** Attach to your bill an itemization and documentation for requested costs in all categories.

## Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:



Electronic service



First class mail, postage prepaid



Other: \_\_\_\_\_

s/ Attorney: s/Loren A. CochranName of Attorney: Loren A. Cochran

For: Plaintiff Zimmeri Contreras Date: 03/29/2024  
*Name of Claiming Party*

## Taxation of Costs

Costs are taxed in the amount of \_\_\_\_\_ and included in the judgment.

By: \_\_\_\_\_

*Clerk of Court**Deputy Clerk**Date*

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)							
NAME , CITY AND STATE OF RESIDENCE	ATTENDANCE		SUBSISTENCE		MILEAGE		Total Cost Each Witness
	Days	Total Cost	Days	Total Cost	Miles	Total Cost	
							\$0.00
							\$0.00
							\$0.00
							\$0.00
							\$0.00
							\$0.00
					<b>TOTAL</b>		<b>\$0.00</b>

**NOTICE**

**Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:**  
“Sec. 1924. Verification of bill of costs.”  
“Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed.”

**See also Section 1920 of Title 28, which reads in part as follows:**  
“A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree.”

**The Federal Rules of Civil Procedure contain the following provisions:**  
**RULE 54(d)(1)**  
Costs Other than Attorneys’ Fees.  
Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

**RULE 6**  
(d) Additional Time After Certain Kinds of Service.  
  
When a party may or must act within a specified time after service and service is made under Rule5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

**RULE 58(e)**  
Cost or Fee Awards:  
  
Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ZIMMERI CONTRERAZ, individually,

Plaintiff,

v.

CITY OF TACOMA, a municipal corporation;  
SOUTH SOUND 911, an Interlocal agreement  
agency; and CHRISTOPER BAIN, in his  
individual capacity,

Defendants.

NO. 3:22-cv-05106-JNW

**DECLARATION OF LOREN A.  
COCHRAN IN SUPPORT OF  
PLAINTIFF'S BILL OF COSTS**

I, LOREN A. COCHRAN, hereby declare under penalty of perjury under the laws of the State of Washington and the United States of America that the following is true and correct:

1. I am over the age of 18, competent to testify as to the matters stated herein and make this declaration based on my personal knowledge.

2. I am one of the attorneys for Plaintiff, Zimmeri Contreras, in this case.

3. Attached to my declaration as **Exhibit 1** are true and accurate copy of the receipts and/or invoices corresponding with Plaintiff's Bill of Costs as follows.

- |   |            |
|---|------------|
| a. Certified Mail to City of Tacoma:              | \$7.00     |
| b. Service Fee for City of Tacoma and Check:      | \$130.00   |
| c. Buell Invoice and Receipt for G. Roberts:      | \$1,049.16 |
| d. Buell Invoice and Receipt for K. Morris:       | \$400.00   |
| e. Buell Invoice and Receipt for C. Bain (video): | \$810.00   |

DECLARATION OF LOREN A. COCHRAN IN  
SUPPORT OF PLAINTIFF'S BILL OF COSTS



- f. Buell Invoice and Receipt for C. Bain: \$1,268.05
- g. Buell Invoice and Receipt for E. Levitt: \$829.25
- h. Buell Invoice and Receipt for K. Morris (II): \$634.70
- i. Buell Invoice and Receipt for G. Roberts (II): \$678.00
- j. Buell Invoice and Receipt for G. Roberts (III): \$297.80

4. The total amount of costs Plaintiff is requesting for pursuant of Plaintiff's Motion for Summary Judgment Regarding the City of Tacoma's Public Records Act Violations is \$5,373.96 as reflected on Plaintiff's Cost Bill.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON AND OF THE UNITED STATES OF AMERICA, 28 U.S.C. ¶ 1746, THAT THE FOREGOING IS TRUE AND CORRECT.

DATED this 29th day of March, 2024.

/s/ Loren A. Cochran  
LOREN A. COCHRAN

DECLARATION OF LOREN A. COCHRAN IN  
SUPPORT OF PLAINTIFF'S BILL OF COSTS

**CERTIFICATE OF SERVICE**

I, **Kim Snyder**, hereby declare under penalty of perjury under the laws of the State of Washington that that I am employed at Cochran Douglas, PLLC.

I served the foregoing document via **ECF** and **Email** by directing delivery to the following individuals:

Kymm Cox  
Jennifer Taylor  
CITY OF TACOMA ATTORNEY  
747 Market Street, Room 1120  
Tacoma, WA 98402  
jtaylor@cityoftacoma.org  
gcastro@cityoftacoma.org  
bpittman@cityoftacoma.org  
kcox@cityoftacoma.org

*Attorneys for Defendants City of Tacoma and Christopher Bain*

**SENT VIA EMAIL PER E-SERVICE AGREEMENT**

DATED this 29th day of March, 2024.

/s/ Kim Snyder  
Kim Snyder

# **EXHIBIT 1**

**(a)**

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

Tacoma, WA 98402

**OFFICIAL USE**

Postage	\$3.50	\$2.85
Certified Fee		\$0.00
Return Receipt Fee (Endorsement Required)		\$0.00
Restricted Delivery Fee (Endorsement Required)		\$0.00
Total Postage & Fees	\$0.55	\$7.00

Postmark  
Here

04/18/2021

Sent To City of Tacoma, Office of the City Clerk  
 Street, Apt. No.,  
 or PO Box No. 747 Market Street, Room 220  
 City, State, ZIP+4 Tacoma, WA 98402

PS Form 3800, June 2002

See Reverse for Instructions

Return Receipt \$2.85

Tracking #:

9590 9402 5930 0049 9252 46

Total \$7.00

Grand Total: \$7.00

Credit Card Remitted \$7.00

Card Name: VTCA

Account #:

Approval #: 090457

Transaction #: 756

AID: A0000000980840

AL: US DEBIT

PIN: Not Required

Chip

7005 0390 0003 4224 3435



**(b)**

Case 3:22-cv-05106-JNW Document 143 Filed 03/29/24 Page 34 of 62

1183

**COCHRAN DOUGLAS, PLLC**

4826 TACOMA MALL BLVD SUITE C  
TACOMA, WA 98409

Heritage Bank  
Olympia, Washington  
HeritageBankNW.com

03/08/2022

PAY TO THE  
ORDER OF

Around Town Courier Service, Inc.

\$ \*\*130.00

One hundred thirty and 00/100\*\*\*\*\*

DOLLARS

Around Town Courier Service, Inc.  
PO Box 1166  
Puyallup, WA 98371-0228

MEMO

Contreraz, Zim -- Invoice 59420



*N. J. G.*

AUTHORIZED SIGNATURE

MP

Security features included. Details on back.



**AROUND TOWN COURIER SERVICE, INC.**

P.O. Box 1166 • Puyallup, WA 98371-0228

Phone: (253) 312-0738

**INVOICE**

**No 59420**

☐ COURIER ☒ PROCESS SERVICE

DATE: 2-15-22

ACCOUNT NO: \_\_\_\_\_

TIME: \_\_\_\_\_  
AM  
PM

☐ REGULAR DELIVERY ☐ SPECIAL DELIVERY

Cochran, Douglas  
JAC mall Blvd  
Tacoma WA

City of Tacoma  
747 Market St  
South Sand 911  
3580 Pacific Ave

REFERENCE: Contreras

TOTAL: 130<sup>00</sup>

RECEIVED BY: \_\_\_\_\_

TIME: \_\_\_\_\_  
AM  
PM

*"Service you can count on."*

*Thank You!  
Carey White*

km  
thank  
you

City of Tacoma  
444 11th Street  
South Tacoma, WA  
3280 Pacific Ave

Lockman Douglas  
1110 1st Ave S  
Tacoma WA  
98402

**(c)**

# BUELL

REALTIME REPORTING

Powered by **Xpress-pay**

Your payment of \$1,049.16 using Visa has been accepted as Transaction ID(s) 3792496406 on 05/08/2023 at 12:12:15 PM. A receipt has been sent to Kim@cochrandouglas.com.

Payment	Details	Amount
Invoice payment	<b>Bill Date:</b> 05/08/23 <b>Invoice #:</b> 88053 <b>Client's name:</b> Cochran Douglas (Contreras)	<b>Amount:</b> \$1,049.16
<b>Subtotal:</b>		<b>\$1,049.16</b>
<b>Payment total:</b>		<b>\$1,049.16</b>

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**INVOICE**

1 of 2



Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No.	Invoice Date	Job No.
88053	5/1/2023	68886
Job Date	Case No.	
4/27/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

## Expedited Original Transcript of:

30(b)(6) Lieutenant Gary J. Roberts	64.00 Pages	310.40
Expedited Transcript Fee		279.36
Attendance Fee	4.00 Hours	380.00
Electronically Certified Transcript: E-Tran and PDF Format	1.00	45.00
Exhibit Production	24.00	14.40
Delivery of Original Transcript	1.00	20.00
<b>TOTAL DUE &gt;&gt;&gt;</b>		<b>\$1,049.16</b>

\*\*\*\*\* COMPLIMENTARY VIDEOCONFERENCE / TELECONFERENCE \*\*\*\*\*

In support of our legal community during the current pandemic, Buell is offering complimentary videoconference and/or teleconference connections for all depositions. Call or email today with any questions and/or to schedule a demo.

In an effort to further reduce litigation costs, the original-ordering party may decline a physical sealed original transcript (for videoconference proceedings only). Please let us know if you would like to hold off on receiving the physical transcript, and your transcript charges will be reduced by 7%, in addition to any associated delivery fee.

The physical sealed original transcript can be ordered at any future date, with standard turnaround being 3-5 business days. As always, expedited delivery will be available if needed sooner.

We appreciate your business!

**Tax ID:** 91-2101641

*Please detach bottom portion and return with payment.*

Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No. : 88053  
Invoice Date : 5/1/2023  
**Total Due : \$1,049.16**

Remit To: **BUELL REALTIME REPORTING, LLC**  
**1325 Fourth Avenue**  
**Suite 1840**  
**Seattle, WA 98101**

Job No. : 68886  
BU ID : TACOMA  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

**INVOICE**

2 of 2



Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No.	Invoice Date	Job No.
88053	5/1/2023	68886
Job Date	Case No.	
4/27/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

Buell is in compliance with WAC 308-14-130(1) in offering court reporting services and fees to all parties on equal terms.

**Tax ID:** 91-2101641

*Please detach bottom portion and return with payment.*

Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No. : 88053  
Invoice Date : 5/1/2023  
**Total Due : \$1,049.16**

Remit To: **BUELL REALTIME REPORTING, LLC**  
**1325 Fourth Avenue**  
**Suite 1840**  
**Seattle, WA 98101**

Job No. : 68886  
BU ID : TACOMA  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.



**(d)**

**BUELL**  
REALTIME REPORTING**Powered by Xpress-pay**

Your payment of \$400.00 using Visa has been accepted as  
Transaction ID 4236982642 on 10/24/2023 at 11:55:04 AM.

Payment	Details	Amount
Invoice payment	<b>Bill Date:</b> 10/24/23 <b>Invoice # :</b> 90665 <b>Client's name :</b> Cochran Douglas (Contreraz)	<b>Amount:</b> \$400.00
<b>Subtotal:</b>		<b>\$400.00</b>
<b>Payment total:</b>		<b>\$400.00</b>

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**INVOICE**

1 of 1



Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No.	Invoice Date	Job No.
90665	8/8/2023	70712
Job Date	Case No.	
8/1/2023	3:22-cv-05106-BHS	
Case Name		
Contreraz v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

## DEPOSITION OF:

Kipling T. Morris  
Attendance Fee

4.00 Hours	400.00
<b>TOTAL DUE &gt;&gt;&gt;</b>	<b>\$400.00</b>

Please note the transcript has not been ordered at this time. If you would like the proceeding transcribed, please call our office at (206) 287-9066. Our standard transcript turnaround time is 7-10 business days; however, with transcripts ordered after the date of deposition, please allow 10-15 business days.

Buell is in compliance with WAC 308-14-130(1) in offering court reporting services and fees to all parties on equal terms.

**Tax ID:** 91-2101641

*Please detach bottom portion and return with payment.*

Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No. : 90665  
Invoice Date : 8/8/2023  
**Total Due : \$400.00**

Remit To: **BUELL REALTIME REPORTING, LLC**  
**1325 Fourth Avenue**  
**Suite 1840**  
**Seattle, WA 98101**

Job No. : 70712  
BU ID : TACOMA  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

**(e)**

# BUELL

REALTIME REPORTING

**Powered by Xpress-pay**

Your payment of \$810.00 using Visa

has been accepted as Transaction ID 4349825952 on 11/20/2023 at 12:21:54 PM.

Invoice payment

**Bill Date:** 11/20/23

**Invoice # :** 73728

**Client's name :** Contreraz

**Amount:** \$810.00

**Subtotal:**

**\$810.00**

**Payment total:**

**\$810.00**

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**INVOICE**

1 of 1



Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No.	Invoice Date	Job No.
93315	11/16/2023	73728
Job Date	Case No.	
11/14/2023	3:22-cv-05106-BHS	
Case Name		
Contreraz v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

## VIDEOTAPED DEPOSITION OF

Officer Christopher Bain

Videographer Hourly Appearance	4.75 Hours	760.00
Original Digital Stock	2.00	40.00
Parking	1.00	10.00

**TOTAL DUE >>> \$810.00**

The video was not ordered at the time of the deposition. Please note, our standard video production turnaround time is 5-7 business days, unless ordered on an expedited basis.

We appreciate your business!

Buell is in compliance with WAC 308-14-130(1) in offering court reporting services and fees to all parties on equal terms.

Tax ID: 91-2101641

*Please detach bottom portion and return with payment.*

Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No. : 93315  
Invoice Date : 11/16/2023  
**Total Due : \$810.00**

Remit To: **BUELL REALTIME REPORTING, LLC**  
**1325 Fourth Avenue**  
**Suite 1840**  
**Seattle, WA 98101**

Job No. : 73728  
BU ID : VIDTACOMA  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

**(f)**

# BUELL

REALTIME REPORTING

**Powered by Xpress-pay**

Your payment of \$1,268.05 using Visa •

been accepted as Transaction ID 4405523550 on 12/04/2023 at 12:20:50 PM.

Invoice payment

**Bill Date:** 12/04/23

**Invoice # :** 93607

**Client's name :** Cochran Douglas (Contreraz)

**Amount:** \$1,268.05

**Subtotal:**

**\$1,268.05**

**Payment total:**

**\$1,268.05**

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# INVOICE

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Loren A. Cochran  
Cochran Douglas, PLLC  
2501 Fawcett Avenue  
Tacoma, WA 98402-1317

Invoice No.	Invoice Date	Job No.
93607	11/29/2023	73727
Job Date	Case No.	
11/14/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

**ORIGINAL TRANSCRIPT OF:**

Officer Christopher Bain

139.00 Pages

743.65

Attendance Fee

4.25 Hours

425.00

Electronically Certified Transcript: E-Tran and PDF Format

1.00

50.00

Exhibit Production

42.00

29.40

Delivery of Original Transcript

1.00

20.00

**TOTAL DUE >>>****\$1,268.05****LOCALLY OWNED | CERTIFIED | PERSONAL SERVICE**

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**Tax ID:** 91-2101641

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Cochran Douglas, PLLC  
2501 Fawcett Avenue  
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Invoice No. : 93607  
Invoice Date : 11/29/2023  
**Total Due : \$1,268.05**

Remit To: **BUELL REALTIME REPORTING, LLC**  
**1325 Fourth Avenue**  
**Suite 1840**  
**Seattle, WA 98101**

Job No. : 73727  
BU ID : TACOMA  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

**(g)**



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Your payment of \$829.25 using Visa ••

been accepted as Transaction ID 4406622096 on 12/04/2023 at 4:36:57 PM.

Invoice payment

**Bill Date:** 12/04/23

**Invoice # :** 93641

**Client's name :** Cochran Douglas (Contreraz)

**Amount:** \$829.25

**Subtotal:**

**\$829.25**

**Payment total:**

**\$829.25**

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Invoice No.	Invoice Date	Job No.
93641	11/29/2023	73738
Job Date	Case No.	
11/21/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

**ORIGINAL TRANSCRIPT OF:**

Erik W. Levitt	96.00 Pages	513.60
Attendance Fee	2.75 Hours	233.75
Electronically Certified Transcript: E-Tran and PDF Format	1.00	50.00
Exhibit Processing (Including Production of Original Exhibits)	11.00	11.90
Delivery of Original Transcript	1.00	20.00
<b>TOTAL DUE &gt;&gt;&gt;</b>		<b>\$829.25</b>

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Invoice No. : 93641  
Invoice Date : 11/29/2023  
**Total Due : \$829.25**

Remit To: **BUELL REALTIME REPORTING, LLC**  
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**Suite 1840**  
**Seattle, WA 98101**

Job No. : 73738  
BU ID : MAIN  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

**(h)**

# BUELL

REALTIME REPORTING

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Your payment of \$634.70 using Visa · has been accepted as Transaction ID 4524367906 on 01/02/2024 at 2:29:02 PM. A receipt has been sent to erin@cochrاندouglas.com.

**Invoice payment**

**Bill Date:** 01/02/24

**Invoice # :** 94454

**Client's name :** Zimmeri Contreras

**Amount:** \$634.70

**Subtotal:** \$634.70

**Payment total:** \$634.70

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Invoice No.	Invoice Date	Job No.
94454	12/28/2023	74620
Job Date	Case No.	
12/19/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

## ORIGINAL TRANSCRIPT OF:

30(b)(6) Kipling T. Morris	57.00 Pages	304.95
Attendance Fee	2.25 Hours	191.25
Electronically Certified Transcript: E-Tran and PDF Format	1.00	50.00
Exhibit Processing (Including Production of Original Exhibits)	14.00	68.50
Delivery of Original Transcript	1.00	20.00
<b>TOTAL DUE &gt;&gt;&gt;</b>		<b>\$634.70</b>

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Invoice No. : 94454  
Invoice Date : 12/28/2023  
**Total Due : \$634.70**

Remit To: **BUELL REALTIME REPORTING, LLC**  
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**Suite 1840**  
**Seattle, WA 98101**

Job No. : 74620  
BU ID : MAIN  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

**(i)**





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**Invoice payment**

**Bill Date:** 01/02/24

**Invoice # :** 94466

**Client's name :** Zimmeri Contreras

**Amount:** \$678.00

**Subtotal:** \$678.00

**Payment total:** \$678.00

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Invoice No.	Invoice Date	Job No.
94466	12/28/2023	74577
Job Date	Case No.	
12/20/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

**ORIGINAL TRANSCRIPT OF:**

Lieutenant Gary J. Roberts	68.00 Pages	363.80
Attendance Fee	2.50 Hours	212.50
Electronically Certified Transcript: E-Tran and PDF Format	1.00	50.00
Exhibit Processing (Including Production of Original Exhibits)	23.00	31.70
Delivery of Original Transcript	1.00	20.00
<b>TOTAL DUE &gt;&gt;&gt;</b>		<b>\$678.00</b>

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Invoice No. : 94466  
Invoice Date : 12/28/2023  
**Total Due : \$678.00**

Remit To: **BUELL REALTIME REPORTING, LLC**  
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**Suite 1840**  
**Seattle, WA 98101**

Job No. : 74577  
BU ID : MAIN  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

(j)



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Your payment of \$297.80 using Visa has been accepted as Transaction ID 4524397494 on 01/02/2024 at 2:34:58 PM. A receipt has been sent to erin@cochrandouglas.com.

**Invoice payment**

**Bill Date:** 01/02/24

**Invoice # :** 94468

**Client's name :** Zimmeri Contreras

**Amount:** \$297.80

**Subtotal:** \$297.80

**Payment total:** \$297.80

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Invoice No.	Invoice Date	Job No.
94468	12/28/2023	74577
Job Date	Case No.	
12/20/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
Payment Terms		
Due upon receipt		

## ORIGINAL TRANSCRIPT OF:

30(b)(6) Lieutenant Gary J. Roberts

Attendance Fee	1.00	Hours	85.00
Minimum Original Transcript Charge	1.00		135.00
Electronically Certified Transcript: E-Tran and PDF Format	1.00		50.00
Exhibit Processing (Including Production of Original Exhibits)	7.00		7.80
Delivery of Original Transcript	1.00		20.00

**TOTAL DUE >>> \$297.80**

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Invoice No. : 94468  
Invoice Date : 12/28/2023  
**Total Due : \$297.80**

Remit To: **BUELL REALTIME REPORTING, LLC**  
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Job No. : 74577  
BU ID : MAIN  
Case No. : 3:22-cv-05106-BHS  
Case Name : Contreras v. City of Tacoma, et al.

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Cole Douglas  
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Invoice No.	Invoice Date	Job No.
94468	12/28/2023	74577
Job Date	Case No.	
12/20/2023	3:22-cv-05106-BHS	
Case Name		
Contreras v. City of Tacoma, et al.		
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Invoice No. : 94468  
Invoice Date : 12/28/2023  
**Total Due : \$297.80**

Remit To: **BUELL REALTIME REPORTING, LLC**  
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Job No. : 74577  
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Case Name : Contreras v. City of Tacoma, et al.